

**LAW OFFICES OF MARTIN E. RESTITUYO, P.C.**

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So ordered. There will be no further extensions, regardless of whether or not the third party defendants are served or pleaded, and regardless of any motions they might make. Discovery must be completed by June 5, 2021. The status conference previously scheduled to be held on July 23, 2021, is rescheduled to June 25, 2021, at 10:00 a.m.

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/s/ Hon. Alvin K. Hellerstein, U.S.D.J.

May 4, 2021

April 30, 2021

*Via ECF*

Hon. Alvin K. Hellerstein  
United States Magistrate Judge  
United States District Court, Southern District of New York  
500 Pearl Street, Courtroom 14D  
New York, New York 10007-1312

Re: Maria Jose Pizarro v. Euros El Tina Restaurant  
Lounge and Billiards, et al., SDNY Case No. 20  
Civ. 5783 (AKH)

Dear Judge Hellerstein,

This office represents defendants, Euros El Tina Restaurant Lounge and Billiards Corp., Santiago Quezada, and Santiago Quezada, Jr. (collectively "Defendants") in the above referenced matter. This action involves claims by plaintiff, a former employee of defendants, of discrimination and retaliation. Defendants have counterclaimed and commenced a third-party action alleging, RICO, conspiracy, fraud, and conversion.

Pursuant to Your Honor's Order dated December 8, 2020 [Dkt. #16] the parties in this action were given until May 14, 2021 to complete depositions and June 1, 2021 to complete all non-expert discovery. Unfortunately, we are still awaiting the successful service of the third-party complaint on defendants Tomas Andres Pizarro Zepeda and Zoilimar Mejia. Moreover, third-party defendants, Emiton Fernandez, Narciso Gomez, Emiton Fernandez, Jose E. Castro, and Eladio Castro Productions Inc. have all been served but have not yet answered or entered an appearance.

Given the nature of the allegations involved, and for reasons of judicial economy, we are of the position that discovery with respect to all parties should proceed along a similar timeline. Thus, we would like to request a two-month extension of all discovery deadlines, so as to permit the third-party defendants to join the case and comply with the scheduling order at the same pace as the original parties to this action.

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Plaintiff's counsel was consulted and consents to this request. This is the first such request made by the Defendants in this action.

Very truly yours,

  
Martin E. Restituyo

cc. Evan Brustein, Esq. via ECF